

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE MIDDLE DISTRICT OF PENNSYLVANIA**

In re:	:	
	:	Case No.: 1:21-bk-00119-HWV
Andrew W. Lentz	:	Chapter 13
Debrah L Lentz	:	Judge Henry W. Van Eck
Debtor(s)	:	*****
	:	
U.S. Bank National Association	:	
Movant	:	
	:	
v.	:	
	:	
Andrew W. Lentz	:	
Debrah L Lentz	:	
Charles J DeHart, III, Trustee	:	
Respondents	:	

**OBJECTION OF U.S. BANK NATIONAL ASSOCIATION TO CONFIRMATION OF
THE PLAN (DOCKET NUMBER 17)**

U.S. Bank National Association ("Creditor") by and through its undersigned counsel, objects to the confirmation of the currently Chapter 13 Plan ("Plan") filed by Andrew W. Lentz and Debrah L Lentz (collectively, "Debtor") as follows:

1. Creditor holds a security interest secured by a lien on Debtor's personal property commonly known as a 2019 Porsche Cayenne with the Vehicle Identification Number WP1AE2AY4KDA50528 ("Property").
2. Creditor has filed Proof of Claim number 9 in the amount of \$104,851.15. This amount includes a pre-petition arrearage in the amount of \$4,644.54.
3. Debtor's Plan seeks to improperly cramdown Creditor's lien to a secured value of \$66,200.00 at an interest rate of 0%.
4. Debtor purchased the Property within the 910-day period preceding the date of the filing of the bankruptcy petition and cannot be crammed down pursuant to 11 USC § 1325.

21-004150_JDD1

WHEREFORE, Creditor respectfully requests that the Court deny the confirmation of the Debtor's currently proposed Plan.

Respectfully submitted,

/s/ Adam B. Hall

Adam B. Hall, Esquire (323867)

Sarah E. Barngrover (323972)

Manley Deas Kochalski LLC

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Columbus, OH 43216-5028

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Attorneys for Creditor

The case attorney for this file is Adam B. Hall.

Contact email is abh@manleydeas.com

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Charles J DeHart, III, Trustee	:	
Respondents	:	

CERTIFICATE OF SERVICE

The undersigned hereby certifies that a copy of the foregoing Objection of U.S. Bank National Association to the Confirmation of the Original Plan was served on the parties listed below via e-mail notification:

Office of U.S. Trustee, Party of Interest, (Registered address)@usdoj.gov

Charles J DeHart, III, Chapter 13 Trustee, 8125 Adams Drive, Suite A, Hummelstown, PA 17036, dehartstaff@pamd13trustee.com

Michael John Csonka, Attorney for Andrew W. Lentz and Debrah L Lentz, Csonka Law, 166 South Main Street, Kerrstown Square, Chambersburg, PA 17201, office@csonkalaw.com

The below listed parties were served via regular U.S. Mail, postage prepaid, on March 17, 2021:

Andrew W. Lentz and Debrah L Lentz, 2033 Parkview Ave, Red Lion, PA 17356

DATE: 03/17/2021

/s/ Adam B. Hall

Adam B. Hall, Esquire (323867)
Sarah E. Barngrover (323972)
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